

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

IN RE: § Case No. 16-10438
DEAN GUTIERREZ, SR. §
Debtor § CHAPTER 11

**SECOND MOTION TO EXTEND DEADLINE TO FILE
POST-CONVERSION SCHEDULES
[RESPECTFULLY REQUESTING 12 ADDITIONAL DAYS]**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE JUDGE EDUARDO V. RODRIGUEZ:

Dean Gutierrez, Sr. (“Debtor”) files this Second Motion to Extend Deadline to file Post-Conversion Schedules, and in support would show the Court the following:

1. On January 23, 2017, the Court entered the Order Allowing Withdrawal of Counsel [ECF 42], at which time Debtor’s former counsel withdrew.
2. Said Order [ECF 42] also extended the deadline for filing post-conversion schedules for 30 days such that the deadline is February 17, 2017 (“Deadline”).

3. On February 17, 2017, the Debtor filed an application to employ new counsel, namely the Application to Employ the Villeda Law Group [ECF 56] (“**New Counsel.**”)

4. On February 17, 2017, the Debtor filed a motion to extend the deadline to file post-conversion schedules [ECF 58] an additional 20 days, allowing New Counsel could become better acquainted with the facts of the case, and based thereon prepare the post-conversion schedules. The Court granted Debtor’s request and entered the Order Granting Debtor’s Motion to Extend Deadline to File Post-Conversion Schedules [ECF 60] on February 21, 2017.

5. Debtor’s New Counsel has been reviewing the facts of the case, but needs a little more time to resolve a few issues. The Debtor respectfully requests that the Court extend the Deadline for an additional 12 days.

Prayer

6. The Debtor prays that the Court extend the Deadline for 12 days until March 21, 2017, and grant the Debtor all further relief to which the Debtor is entitled.

Respectfully submitted,

VILLEDA LAW GROUP
6316 North 10th Street, Bldg. B
McAllen, Texas 78504
Telephone: (956) 631-9100
Facsimile: (956) 631-9146

/s/ Christopher Cheatham
CHRISTOPHER CHEATHAM
State Bar No. 24053140
Email: ccheatham@mybusinesslawyer.com

/s/ Antonio Villeda

ANTONIO VILLEDA
State Bar No. 20585300
Email: avilleda@mybusinesslawyer.com

Attorneys for Debtor